

CC Docket No. 94-102 – Status Report

Filed by: Key Communications, L.L.C.
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Date: August 1, 2006

To: Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

By Electronic Submission:

Catherine W. Seidel, Acting Bureau Chief
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Federal Communications Commission
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Federal Communications Commission
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STATUS REPORT
Due August 1, 2006
CC Docket No. 94-102

Key Communications, L.L.C. ("Key") hereby submits its E911 Status Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, *Order*, 20 FCC Rcd 16927 ¶19 (2005).

Carrier Identifying Information:

Carrier Name: Key Communications, L.L.C. – FRN 0005 4134 63

E911 Compliance Officer: Dennis Bloss
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Information Regarding PSAPs:

Key has not received any new PSAP requests since the submission of its May 1, 2006 Status Report. To date, Key has received a total of nine Phase I requests and nine Phase II requests. Key is compliant with all Phase I requests.

Key continues to update all of the requesting PSAPs on the status of its implementation of Phase II E-911, and to provide each of them with copies of all related submissions to the Federal Communications Commission. Specifically, Key has maintained communications with Dannie Walker at the West Virginia Public Utilities Commission, who serves as the liaison with the West Virginia PSAP directors, regarding status of Key's implementation of Phase II E-911. Mr. Walker has not expressed any concerns or issues, either himself or on behalf of any individual PSAP, respecting Key's Phase II E-911 implementation efforts. Additionally, Key has not been contacted directly by any PSAP expressing any concerns or issues respecting Key's Phase II E-911 implementation efforts.

Implementation of Phase II Service:

As previously reported, Key is committed to using a network-based solution for Phase II E-911 in its market and has been exploring the network-based solutions being developed by Polaris Wireless, Inc., and GBSD Technologies, Inc., among

others. Keystone has been working closely with GBSD in recent months to determine whether its Phase II solution – *i.e.*, The Compass™ Location System (“The Compass™”) – is a viable option for implementing Phase II E-911 in Key’s market. Additionally, Key has been and continues to monitor the market for new product development, but as of yet has found no new products or modifications to existing products that might potentially serve as Phase II solutions for Key’s market.

In light of the foregoing, Key does not anticipate that Phase II E-911 service will be available in its network in the near future. Key is continuing to search out and explore other network-based Phase II solutions in the hopes of finding a viable solution for its market, and continues to aim toward a target date of December 31, 2006, for implementation of a Phase II E-911 solution within its network.

Construction of New Cells and Expansion of Coverage:

Key has not built any new cell sites since the submission of its May 1, 2006 Status Report.